

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

----- In the Matter of ----- )  
 )  
PUBLIC UTILITIES COMMISSION ) DOCKET NO. 2022-0212  
 )  
Instituting a Proceeding Relating )  
To an Innovative Pilot Process for )  
The Hawaiian Electric Companies. )  
\_\_\_\_\_ )

ORDER NO. 40650

APPROVING MODIFICATIONS TO THE CHARGE READY HAWAII PILOT PROJECT

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APPROVING MODIFICATIONS TO THE CHARGE READY HAWAII PILOT PROJECT

By this Order,<sup>1</sup> the Public Utilities Commission ("Commission") approves, subject to conditions, Hawaiian Electric's request to modify the Charge Ready Hawaii Pilot Project ("Charge Ready Pilot") filed on January 10, 2024,

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<sup>1</sup>The Parties to this proceeding are HAWAIIAN ELECTRIC COMPANY, INC., HAWAII ELECTRIC LIGHT COMPANY, INC., MAUI ELECTRIC COMPANY, LIMITED (collectively, "Hawaiian Electric" or the "Companies"), and the DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS, DIVISION OF CONSUMER ADVOCACY ("Consumer Advocate"), an ex officio party to this proceeding, pursuant to Hawaii Revised Statutes § 269-51 and Hawaii Administrative Rules ("HAR") § 16-601-62(a). Pursuant to Order No. 38663 (opening the docket), this proceeding is intended to receive filings and adjudicate requests submitted by Hawaiian Electric pursuant to the innovative pilot process under the Performance-Based Regulation Framework. See Order No. 38663, "Opening the Docket," filed on October 20, 2022 ("Order No. 38663"). See also, Docket No. 2018-0088, Decision and Order No. 37507, filed on December 23, 2020. Due to the nature of this docket, motions to intervene or participate are not contemplated; however, any interested person, including the Consumer Advocate, may file comments on an individual pilot notice. See Order No. 38663 at 5-7.

and January 25, 2024,<sup>2</sup> pursuant to the Commission's expedited pilot process ("Pilot Process").<sup>3</sup> As a result, Hawaiian Electric may remove the dedicated metering and Commercial EV rate enrollment requirements for primary-metered customers who enroll in the Charge Ready Pilot. The Pilot is also extended from January 24, 2025, to December 31, 2025.

I.

BACKGROUND

A.

The Charge Ready Pilot

The Charge Ready Pilot was initially the subject of Docket No. 2020-0202. Briefly, the pilot involves:

[I]nstalling make-ready infrastructure to enable an estimated 180 charging ports in the Companies' service territories. This is intended to support customer installation of EV charging infrastructure

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<sup>2</sup>Letter From: A. Marceau To: Commission Re: Docket No. 2022-0212 - Innovative Pilot Process; Proposed Modification to Charge Ready Hawai'i Pilot Terms and Conditions, filed on January 10, 2024 ("Initial Request"); and Letter From: A. Marceau To: Commission Re: Docket No. 2022-0212 - Innovative Pilot Process; Proposed Extension to Charge Ready Hawai'i Pilot, filed on January 25, 2024 ("Supplemental Request"). Throughout this Order, the Initial Request and Supplemental Request shall be referred to collectively as the "Modification Request," however, citations shall refer to each document respectively.

<sup>3</sup>See Order No. 38663, "Opening the Docket," filed on October 20, 2022 ("Order No. 38663"); and Docket No. 2018-0088, Decision and Order No. 37507, filed on December 23, 2020 ("Decision and Order No. 37507") at 166-181.

at commercial sites, multi-unit dwelling ("MUDs"), and fleet parking locations at the Companies' expense. The Pilot would target 30 customer sites, over a 3-year period, across the three Companies (the individual capital expenditure for each Company is not expected to exceed \$2.5 million), at a total cost of no more than \$4.98 million.<sup>4</sup>

In pertinent part, Charge Ready Pilot participants must follow certain requirements, including, in pertinent part:

- g. Participant agrees to take service on the proposed EV-J or EV-P tariffs, if the tariffs are approved. The charging station must be separately metered from the rest of the site to support data collection.<sup>5</sup>

The Companies proposed to implement the Charge Ready Pilot in three phases:

- (1) Design, during which the Companies will develop necessary documentation for Pilot implementation, while continuing to solicit customer interest (estimated to be six (6) to eight (8) months),
- (2) Implementation, during which the Companies will work with customers to confirm eligibility and site sufficiency, as well as design, construction, and installation of make-ready infrastructure (estimated to be 18 months), and
- (3) Utilization and Data Collection (estimated to be 12 months), which will begin following completion of the

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<sup>4</sup>Docket No. 2020-0202, Decision and Order No. 38194, filed on January 24, 2022 ("D&O 38194"), at 8-9. "Make-ready" refers to "all infrastructure that the customer would otherwise be responsible for under Rule 14 Service Connections and is necessary to provide electrical service to the charging stations (including facilities on the customer side of the meter), but excludes the charging stations, which are provided by the customer." Id. at 8 n. 25.

<sup>5</sup>D&O 38194 at 14.

Implementation phase and will involve the Companies collecting data . . . .<sup>6</sup>

On September 23, 2022, following the Design phase of the Charge Ready Pilot, the Companies filed their Final Design Report for Charge Ready Pilot.<sup>7</sup> In pertinent part, the Final Design Report clarified:

In order to ensure wide participation and funding for as many participants as possible the Company added a per project monetary cap to the Pilot. The Company will install the Make-Ready Infrastructure required to support the installation of four to six Level 2 charging ports in an amount not to exceed \$90,000 per site, at no cost to the Participant. If the cost exceeds the \$90,000 cap, the Participant has the option to pay excess costs, reduce the number of charging ports, or request other changes to the Final Design, to reduce the projected installation costs.<sup>8</sup>

On October 25, 2022, the Companies launched the Charge Ready Pilot.<sup>9</sup>

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<sup>6</sup>D&O 38194 at 16-17.

<sup>7</sup>Docket No. 2020-0202, Letter From: K. Katsura To: Commission Re: Docket No. 2022-0202 - Hawaiian Electric Companies For Approval of Charge Ready Hawaii Pilot Project; Final Program Design Report, filed on September 23, 2022 ("Final Design Report").

<sup>8</sup>Final Design Report at 10.

<sup>9</sup>Docket No. 2020-0202, Letter From: K. Katsura To: Commission Re: Docket No. 2020-0202 - For Approval of the Charge Ready Pilot Project and to Recover Costs through the Renewable Energy Infrastructure Program Surcharge; Response to Consumer Advocate's Final Program Design Report Comments, filed on November 23, 2022. See also Program Design Report at 5 (stating that "Pilot launch will occur after the expiration of the 30-day review period, or upon completion of any action ordered by the Commission upon completion of its 30-day review.").

B.

Proposed Modifications

On January 10, 2024, the Companies filed a letter request seeking to modify the Charge Ready Pilot. In response to attempts to solicit participant enrollment in the Pilot, the Companies reported that they encountered issues with primary-metered customers<sup>10</sup>:

Under the current Pilot terms and conditions as specified in Section IV of the Participation Agreement, Pilot participants are required to have a dedicated meter and enroll in a Commercial EV rate (i.e., Schedule EV-J or EV-P). In order to participate, applicants who are primary-metered, including several Hawaii Island hotels, would need to install a new pad-mount transformer for a new dedicated meter. These applicants were initially declined because the addition of a new pad-mount transformer would result in significant delays and higher infrastructure costs that would likely exceed the \$90,000 cap.<sup>11</sup>

To address this issue, the Companies propose modifying the Charge Ready Pilot to remove the requirements for a dedicated meter and enrollment in Commercial EV rates for primary-metered customers. This "will enable more participation from hotels and

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<sup>10</sup>According to the Companies, "primary-metered customers" involve situations where "a utility meter has been installed on a high voltage distribution line and the customer has installed their own transformer behind the meter to step down the voltage for the facility (as opposed to secondary-metered situations where the utility installs a transformer to step down voltage before the meter)." Initial Request at 1-2.

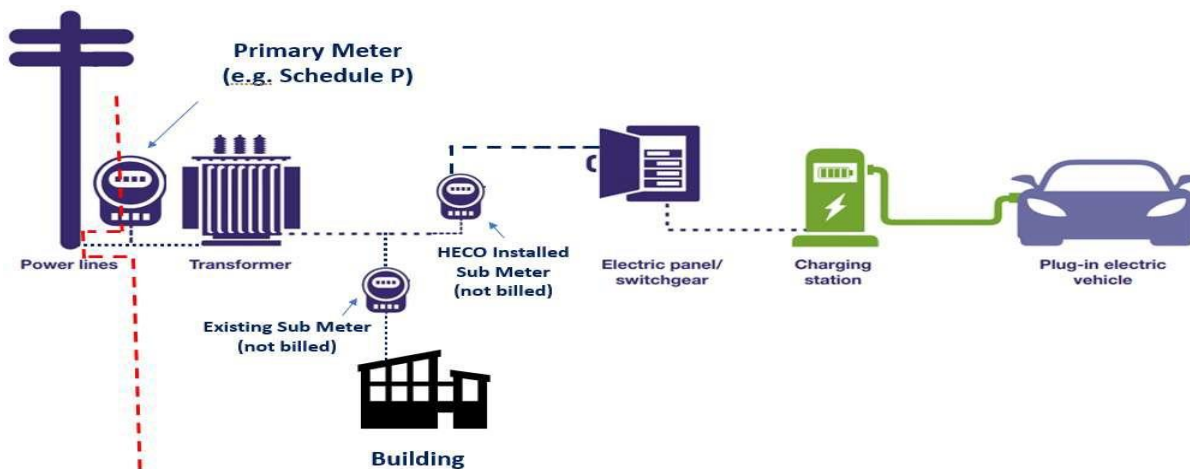
<sup>11</sup>Initial Request at 2.

a more competitive applicant pool.”<sup>12</sup> In support of the proposed modification, the Companies state:

Under the proposed change, without a dedicated meter and participation in a Commercial EV rate, Hawaiian Electric will still receive charging session data from all participants but will not receive Commercial EV raw meter data for a limited pool of primary-metered participants. The charging session data will provide Hawaiian Electric with insights to charging behaviors and help inform future programs. In addition, Hawaiian Electric will install a non-utility sub-meter for the primary-meter customers and require these customers to provide monthly readings, which will capture total EV charging energy consumption to supplement charging session data.<sup>13</sup>

This modified configuration for primary-metered customers is reflected in Figure 2 reproduced below:<sup>14</sup>

Figure 2. Make-Ready Infrastructure Configuration for Primary-Metered Customers



<sup>12</sup>Initial Request at 2.

<sup>13</sup>Initial Request at 2.

<sup>14</sup>Response to PUC-HECO-IR-01.a, filed on February 20, 2024.

The Companies clarified that they will be responsible for installing the new sub-meter and electrical panel.<sup>15</sup>

Subsequently, on January 25, 2024, the Companies supplemented their request to modify the Charge Ready Pilot by additionally requesting that the Pilot be extended by approximately 11 months from January 24, 2025, to December 31, 2025.<sup>16</sup> In support of this additional request, the Companies stated that this extension was based on lower-than-expected participation in the Pilot and a desire for more time to increase enrollment.<sup>17</sup> In particular, the Companies stated that Pilot participants have taken an average of approximately eight months to complete their applications and that no participation agreements have been executed on Hawaii Island.<sup>18</sup> Reproduced below is a table reflecting the modified Implementation phase timeline:<sup>19</sup>

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<sup>15</sup>Response to PUC-HECO-IR-01.b, filed on February 20, 2024.

<sup>16</sup>Supplemental Request at 1.

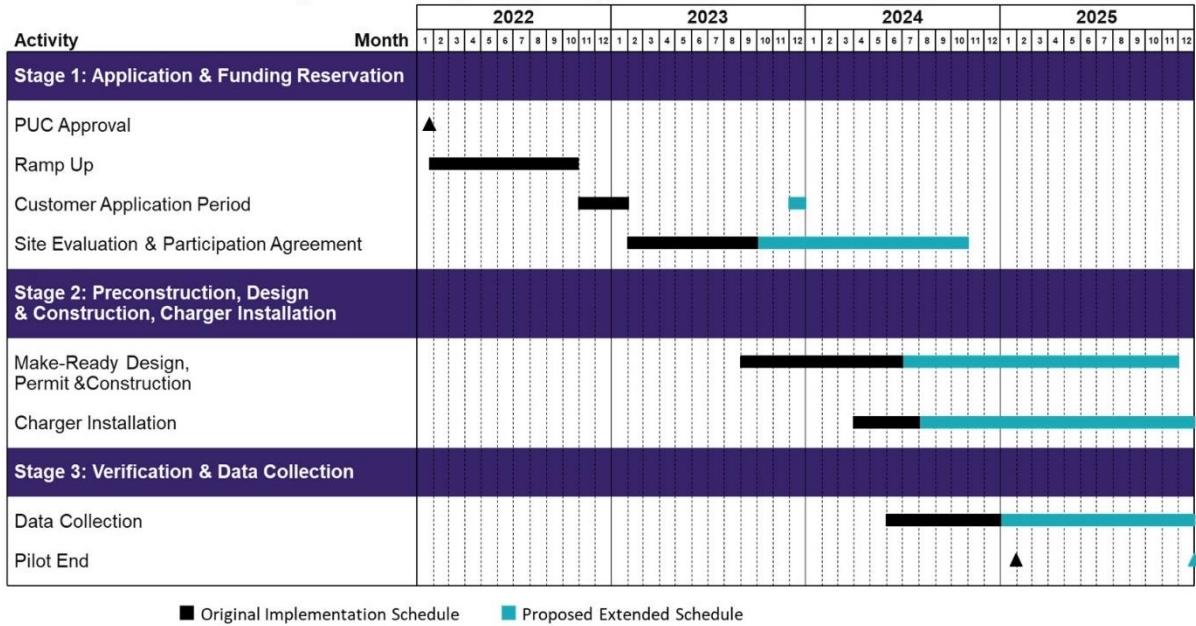
<sup>17</sup>Supplemental Request at 1.

<sup>18</sup>Supplemental Request at 1-2.

<sup>19</sup>Supplemental Request at 2.



Figure 1. Adjusted Implementation Timeline



The Companies state that these modifications will not increase the Charge Ready Pilot's costs beyond the budget previously approved by the Commission.<sup>20</sup>

II.

DISCUSSION

Under the Pilot Process, a request to modify an approved pilot requires Commission approval and must be submitted 45 days in advance of the proposed modification.<sup>21</sup> Additionally, a request

<sup>20</sup>Supplemental Request at 2.

<sup>21</sup>Order No. 38663 at 11 (citing D&O 37507 at 174).

to extend an approved pilot must be submitted no later than one year prior to the scheduled termination of the pilot.<sup>22</sup>

The Commission finds that the Companies' Modification Request is timely. Although the Companies have not proposed a specific date for the modifications to take effect, they have submitted a request pursuant to the Pilot Process, which contemplates approval of the request within 45 days unless the Commission takes affirmative action.<sup>23</sup> Thus, the request to modify the Charge Ready Pilot is made at least 45 days in advance of its proposed effect. Further, the Charge Ready Pilot is scheduled to expire on January 24, 2025; thus, the Companies request (as supplemented), filed on January 25, 2024, is made one year in advance of the Pilot's scheduled termination.<sup>24</sup>

Upon review of the record, the Commission finds the Companies' proposed modifications to the Charge Ready Pilot reasonable. In reaching this conclusion, the Commission considers the following:

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<sup>22</sup>D&O 37507 at 180.

<sup>23</sup>Order No. 38663 at 11-12.

<sup>24</sup>See Letter From: Commission To: A. Marceau Re: Docket No. 2022-0212 - Hawaiian Electric Companies' Charge Ready Hawaii Pilot, filed on February 12, 2024 (clarifying that the 45-day review period under the Pilot Process would begin to run from the date of the Supplemental Request).

1. The modifications are expected to increase enrollment in the Charge Ready Pilot, including participants from Hawaii Island, which currently has no participants enrolled in the Pilot.<sup>25</sup>

A. While primary-metered participants will not be incentivized to charge EVs during the daytime due to their non-enrollment in the Commercial EV schedules, they are still expected to provide valuable data to the Companies, including data from Hawaii Island that may not otherwise be available.<sup>26</sup>

2. The modifications are not expected to impact the goals or objectives of the Charge Ready Pilot.<sup>27</sup>

A. Even with the modifications, it appears that only a small proportion of Pilot participants will be primary-metered customers.<sup>28</sup>

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<sup>25</sup>See Response to PUC-HECO-IR-07.e and f, filed on March 4, 2024 (estimating 18-20 Pilot participants if the modifications are approved and 16-18 participants if the modifications are not approved); and Response to PUC-HECO-IR-02, filed on February 20, 2024 ("However, if the proposed change is accepted, the Company expects two primary-metered commercial customers on Hawai'i Island to participate, expanding Pilot participation to Hawai'i Island.").

<sup>26</sup>See Response to PUC-HECO-IR-02; and Response to PUC-HECO-IR-07.a (stating that if the proposed modifications are approved, the Companies expect that two Hawai'i Island hotels will enroll in the Pilot).

<sup>27</sup>Response to PUC-HECO-IR-06.c, PUC-HECO-IR-07.c and PUC-HECO-IR-08, filed on March 4, 2024.

<sup>28</sup>See Response to PUC-HECO-IR-07.b.

3. The modifications are not expected to increase the Pilot's per customer or overall costs.<sup>29</sup>

A. The most common cited reason for rejecting a customer's application to enroll in the Pilot is related to site conditions, which would involve work that would exceed the \$90,000 cap per participant.<sup>30</sup> The modifications represent a means by which to increase participation in the Pilot without needing to increase the Pilot's costs.

4. The Commission did not receive any comments regarding the proposed modifications.<sup>31</sup>

However, in light of the aforementioned challenges with implementing the Charge Ready Pilot, the Commission believes additional information to help monitor its progress is desirable. To that end, the Commission will require that, upon obtaining the final selection of participants for the Charge Ready Pilot, the Companies shall file with the Commission a list of all applications for the Pilot received, including: (1) the number of

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<sup>29</sup>See Supplemental Request at 2 ("The proposed change to the implementation schedule will not increase Pilot costs beyond the original Pilot budget approved by the Commission in Docket No. 2020-0202.[] The \$90,000 cost cap on construction and material expenses remains for each Pilot participant."); and Response to PUC-HECO-IR-05, filed on February 22, 2024 (reflecting updated Charge Ready Pilot costs (as of February 22, 2024) of \$4,887,628.)

<sup>30</sup>Response to PUC-HECO-IR-04.b, filed on February 20, 2024.

<sup>31</sup>See Order No. 38663 at 12-13 (Paragraph 10).

applicants who dropped out and for what reasons; and (2) the number of applicants the Companies declined and for what reasons.

III.

ORDERS


THE COMMISSION ORDERS:

Hawaiian Electric's request to modify the Charge Ready Pilot, as proposed in the Modification Request filed on January 10, 2024, and January 25, 2024, is granted, subject to the reporting condition described above.

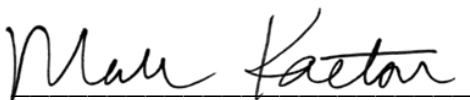
DONE at Honolulu, Hawaii MARCH 7, 2024.

PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

By   
Leodoloff R. Asuncion, Jr., Chair

By   
Naomi U. Kuwaye, Commissioner

APPROVED AS TO FORM:

  
Mark Kaetsu  
Commission Counsel

By   
Colin A. Yost, Commissioner

2022-0212.ljk

CERTIFICATE OF SERVICE

The foregoing Order was served on the date it was uploaded to the Public Utilities Commission's Case Document Management System and served through the Case and Document Management System's electronic Distribution List

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